

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

FELIPE AGUILAR ORTEGA,
Plaintiff

V.

**JORDAN EXPRESS TRUCKING AND
SHAWN ECHOLS,**
Defendants

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CIVIL ACTION NO. 4:22-cv-579

NOTICE OF REMOVAL

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

Pursuant to 28 U.S.C. §§ 1332 and 1441(a), Defendant, JORDAN EXPRESS TRUCKING, hereby removes this action to the United States District Court for the Southern District of Texas from the 434th Judicial District Court of Fort Bend County, Texas, stating as follows:

1. Plaintiff, Felipe Aguilar Ortega, commenced this action in the 434th Judicial District Court of Fort Bend County, Texas, where it was given Cause No. 21DCV288491. This action is between citizens of different states. Plaintiff is a resident of Texas. Defendant Shawn Echols is a resident of Arkansas; Defendant Jordan Express Trucking is an Arkansas corporation. Further, Plaintiff claims damages for personal injury and states in her Petition that he is seeking damages in the amount over \$1,000,000.00 for the following:

- a. Medical treatment in the past and future;
- b. Loss of earning capacity and lost wages in the past and future;
- c. Physical pain, suffering and mental anguish in the past and future;
- d. Physical impairment in the past and future;
- e. Disfigurement in the past and future.

Accordingly, this Court has original jurisdiction under 28 U.S.C. § 1332.

2. Defendant Jordan Express Trucking received the summons and complaint on January 25, 2022, so this removal is timely under 28 U.S.C. § 1446(b).

3. A copy of all process, pleadings, and orders served upon Defendant is attached as Exhibit A.

4. Defendant has provided written notice of this Notice of Removal to all adverse parties and has filed a copy with the Clerk of the 434th Judicial District Court of Fort Bend County, Texas.

5. Defendant Jordan Express Trucking consents to the removal.

Dated: February 22, 2022.

Respectfully submitted,

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BY: _____



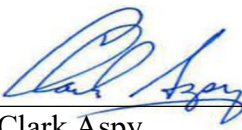
P. Clark Aspy
State Bar No. 01394170
Jay Lea
State Bar No. 24062843

ATTORNEY FOR DEFENDANT, JORDAN
EXPRESS TRUCKING

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been forwarded by the manner indicated below to all counsel of record on this 22nd day of February 2022.

Frank Robertson
Langdon “Trey” Smith
Philip Broderick
Jim Adler & Associates
12605 East Freeway, Suite 400
Houston, Texas 77015



P. Clark Aspy